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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. :

CERTAIN PERSONS :

MAGISTRATE NO. 11-711-M

FILED

JUN -7 2011

MICHAEL E. KUNZ, Clerk
BY Dep. Clerk

GOVERNMENT'S MOTION TO IMPOUND

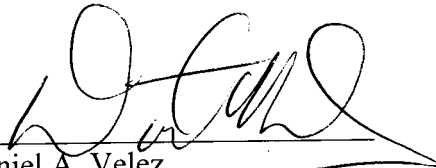
The United States of America, by and through its attorneys, Zane David Memeger, United States Attorney in and for the Eastern District of Pennsylvania, and Daniel A. Velez, Assistant United States Attorney for the District, moves to impound the within documents and related docket entries, and in support of its Motion states as follows:

1. The within Motion is a document which, if made public would jeopardize the government's interest in protecting a cooperating witness, and not jeopardizing an ongoing criminal investigation.
2. Although the public has a common law right of access to judicial proceedings and papers, matters relating to protecting cooperating witnesses and not jeopardizing an ongoing criminal investigation are traditionally conducted ex parte and in camera, with deference to the government's determination that investigative matters should be sealed.
3. Accordingly, balancing the public's right of access to judicial documents with the government's interest in protecting cooperating witnesses and not jeopardizing an ongoing criminal investigation, the government respectfully requests that the government's

Motion be GRANTED. The government further requests that the Clerk of Court be directed to make no public docket entry of the sealed documents and motion and order to seal, and to provide copies of all sealed documents only to Daniel A. Velez, Assistant United States Attorney.

Respectfully submitted,

ZANE DAVID MEMEGER
United States Attorney



Daniel A. Velez
Assistant United States Attorney